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**U.S. DISTRICT COURT  
FOR THE  
DISTRICT OF NEVADA**

NML CAPITAL, LTD.,  
  
Plaintiff,  
  
vs.  
  
THE REPUBLIC OF ARGENTINA,  
  
Defendant.

2:14-cv-00492-JAD-VCF

**DECLARATION OF KENT P.  
WOODS IN SUPPORT OF NON-  
PARTY WITNESSES MF  
CORPORATE SERVICES (NEVADA)  
LIMITED AND PATRICIA  
AMUNATEGUI'S EMERGENCY  
MOTION TO EXCLUDE NML  
CAPITAL LTD.'S PROPOSED  
DEMONSTRATIVE EXHIBITS AND  
TO ENFORCE PROTECTIVE  
ORDER**

Kent P. Woods makes this Declaration pursuant to 28 U.S.C. § 1746:

1. I am Kent P. Woods, an attorney at the firm of Woods Erickson & Whitaker LLP and counsel for non-party witnesses MF Corporate Services (Nevada) Limited ("MF Nevada") and Patricia Amunategui ("Ms. Amunategui") in the above-captioned case.

2. I submit this declaration in support of MF Nevada's and Ms. Amunategui's Emergency Motion to Exclude NML Capital Ltd.'s Proposed Demonstrative Exhibits and to Enforce Protective Order (the "Motion"). I have personal knowledge of the facts set forth herein, and if called upon to do so, would testify thereto.

1           3.     On December 10, 2014, counsel for NML submitted to me a series of presentation  
2 materials, comprising approximately seventy printed pages. Counsel characterized them as  
3 demonstrative exhibits to be submitted to the Court in connection with a hearing to be held on  
4 December 12, 2014.

5           4.     Upon preliminary review of the proposed exhibits, I informed counsel that in  
6 addition to several evidentiary issues, that the exhibits as constituted contained references and  
7 citations to certain Confidential Discovery Material, the use of which is governed by the  
8 Protective Order entered by this Court.

9           5.     On December 11, 2014, counsel for NML informed me that NML would remove  
10 from its presentation the pages containing Confidential Discovery Material for presentation to  
11 the Court *in camera*, if the Court grants various motions to seal this material and does not restrict  
12 public access to the proceedings.

13           6.     Counsel for Val De Loire, LLC, informed me that he had held a substantial “meet  
14 and confer” conference with NML’s counsel to discuss the evidentiary and confidentiality issues  
15 at play in the proceeding and that they were unable to reach an agreement. Because the issues  
16 raised by Val De Loire, LLC are the same as the concerns of MF Nevada and Ms. Amunategui  
17 with respect to the proposed demonstrative exhibits, it did not appear that an additional “meet  
18 and confer” session would be useful. Due to other issues arising related to preparation for the  
19 December 12 hearing and response to other matters at issue for the hearing, it was not practicable  
20 to meet and confer personally with counsel for NML with respect to the Motion. However, upon  
21 information and belief, this was not necessary given that Val De Loire, LLC addressed similar or  
22 identical concerns with NML during their conference.

23           7.     Emergency action is required with respect to this matter because the hearing at  
24 which NML wishes to submit its proposed exhibits is scheduled for December 12, 2014, and the  
25 proposed exhibits were not submitted to MF Nevada until December 10, 2014. Response to MF  
26 Nevada’s concerns was not received until earlier on the day of the filing. There is no method by  
27 which these issues could be addressed in time for the December 12 hearing without emergency  
28 action by this Court.

